

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 17-
v.	:	
		DATE FILED: March 28, 2017
ELDON STONE ROSS	:	
	:	VIOLATION:
	:	18 U.S.C. § 1960(a) (Unlicensed money
	:	transmitting business)
	:	Notice of Forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

Beginning in or about 2015, and continuing until November 17, 2016, in the Eastern District of Pennsylvania and elsewhere, defendant

ELDON STONE ROSS

knowingly conducted, controlled, managed, supervised, directed and owned all and part of an unlicensed money transmitting business, as that term is defined in Title 18, United States Code, Section 1960(b)(1)(B), which failed to comply with the money transmitting business registration requirements under Title 31, United States Code, Section 5330 and the regulations prescribed under that section, and which affected interstate and foreign commerce.

In violation of Title 18, United States Code, Section 1960.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1960, set forth in this information, defendant

ELDON STONE ROSS

shall forfeit to the United States of America any property involved in the commission of the offense, or any property traceable to such property, including, but not limited to:

- 1) Apple Laptop S/N C02HPAZSDV35
- 2) MacBook Pro S/N C02R3QW3FVH3
- 3) iPhone S/N C6KRLYJUGRY02.
- 4) \$40,000

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 1982(a)(1).

Peter F. Schenck for

LOUIS D. LAPPEN
Acting United States Attorney